

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)

**RELIANCE INSURANCE CO.**  
Judgment Creditor

v.

Case No.: 1:97-CV-03194-MJG

**WILLIAM RAY MILLER, II**  
Judgment Debtor

**JUDGMENT CREDITOR RELIANCE'S OPPOSITION  
TO JUDGMENT DEBTOR MILLER'S  
MOTION TO STAY EXECUTION ON JUDGMENT**

Judgment Creditor, Reliance Insurance Co. in receivership ("Reliance"), by its undersigned attorneys, files this opposition to the Motion to Stay Execution on Judgment filed by judgment debtor William Ray Miller, II ("Mr. Miller"), and states as follows.

1. On July 13, 2000, this Court entered judgment against Mr. Miller and in favor of Reliance with respect to Reliance's claims for constructive fraud, in the amount of \$472,500, plus pre-judgment and post-judgment interest. Thereupon, Mr. Miller became a judgment debtor of Reliance.

2. Mr. Miller has made no payments in satisfaction of that judgment, and has evaded Reliance's efforts to enforce the judgment, by filing multiple bankruptcy petitions and appeals, concealing his assets and income, and improperly resisting post-judgment discovery.

3. The United States Bankruptcy Court for the District of Maryland and this Court have ruled that Reliance's judgment against Mr. Miller is not dischargeable in bankruptcy.

4. The United States Court of Appeals for the Fourth Circuit has affirmed the non-dischargeability of Reliance's judgment against Mr. Miller. 144 Fed.Appx. 966, 2005 WL.

5. Mr. Miller's motion cites no legal authority whatsoever. The only reason Mr. Miller gives is his desire for "settlement" discussions that he hopes will allow him to pay something less than the full amount that he owes. There is nothing to settle, because Reliance has a final, non-appealable, non-dischargeable judgment.

6. There no legal or factual basis for the Court to stay enforcement of the judgment.

For all of the foregoing reasons, the motion to stay execution on judgement should be denied.

/S/

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